

AO 91 (Rev. 11/11) Criminal Complaint

United States Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

APR 21 2016

David J. Bradley, Clerk of Court

United States of America  
v.  
ANTONIO RASHEED BENJAMIN

Case No.

**H 16-608 M**

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Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/01/2016 in the county of HARRIS in the  
SOUTHERN District of TEXAS, the defendant(s) violated:*Code Section**Offense Description*Title 18 United States Code  
Section 1591 (a)(2)

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Theo Williams, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 04/21/2016City and state: Houston, Texas*Judge's signature*

Nancy K. Johnson, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Theo Williams, being duly sworn, depose and state:

I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the Special Agent in Charge (SAC), in Houston, Texas. I am currently employed as an Investigator on the Houston Child Exploitation Task Force (HCETF) that is tasked to investigate crimes involving sex trafficking of children. I have been employed with the FBI since 2011 wherein I served four years as a Criminal Intelligence Analyst and three years as a Federal Agent. During this time, I have investigated over 100 cases involving human trafficking, including sex trafficking of children, and sex trafficking of adults. As part of my daily duties as an FBI agent, I investigate criminal violations relating to sex trafficking of children, in violation of 18 U.S.C. § 1591 (a). Your affiant has specialized training in investigations of child sexual abuse, Domestic Sex Trafficking, computer evidence handling and other police matters. Some of those courses included Conferences on Human Trafficking, Interviewing and interrogation, Juvenile Forensic Interviewing and Investigating, and Investigation of sex crimes.

1. Sex trafficking of children, as defined in 18 U.S.C. § 1591 (a), is:

(a) Whoever knowingly—

(1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

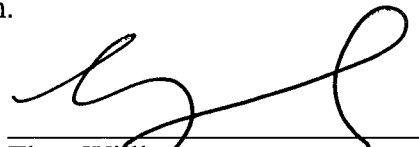
2. This Affidavit is made in support of a criminal complaint charging Antonio BENJAMIN with violating 18 U.S.C. § 1591(a), which makes it a crime to traffic children for the purpose of sex.
3. I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and my conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous investigations involving sex trafficking of children.
4. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of an ongoing violation of 18 U.S.C. § 1591(a) has been committed by Antonio Rasheed BENJAMIN in or around March 2016. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
5. On March 9, 2016, Houston Police Department (HPD) Police Officer K. O. Himes made contact with Chelsey Thomas. Thomas filed an official police report against BENJAMIN alleging she was violently assaulted by BENJAMIN on March 7, 2016. According to HPD reporting, Thomas was violently assaulted by BENJAMIN on more than one occasion. On March 7, 2016, BENJAMIN and Thomas had a verbal disagreement which resulted in BENJAMIN denying Thomas the option to enter the vehicle he was driving. Thomas proceeded to open a car door in an attempt to enter the vehicle. At that time, BENJAMIN, with knowledge of Thomas still holding on to the door handle, began to drive off dragging Thomas with the vehicle. Thomas suffered several severe abrasions

and scratches as a result of being dragged by the car BENJAMIN was driving. The injuries were documented with photographs and turned over to HPD.


6. According to a HPD report taken, on March 9, 2016, Thomas indicated BENJAMIN was “pimping” MINOR VICTIM 1, a 17 year old female with a date of birth September 1, 1998. Thomas indicated that MINOR VICTIM 1 attended a specific High School in Houston, Texas.
7. On April 06, 2016, FBI Special Agent Theo Williams and HPD Officer D. Nieto interviewed MINOR VICTIM 1. During the interview, MINOR VICTIM 1 indicated she was forced to engage in commercial sex acts for BENJAMIN. After being kicked out of her mother’s home, MINOR VICTIM 1 lived with and engaged in commercial sex for BENJAMIN for approximately one month around March 2016. BENJAMIN made sure MINOR VICTIM 1 attended high school by transporting her to and from school on a daily basis. MINOR VICTIM 1 confirmed she attended the specific high school THOMAS mentioned. BENJAMIN promised MINOR VICTIM 1 a lavish lifestyle filled with cars and riches.
8. BENJAMIN monitored MINOR VICTIM 1’s communications with individuals interested in commercial sex and instructed her on what to say during the conversation. BENJAMIN also instructed MINOR VICTIM 1 to receive payment for the commercial sex before performing them, and ensure customer’s used condoms.
9. MINOR VICTIM 1 was forced to engage in commercial sex every day during her time with BENJAMIN. MINOR VICTIM 1 performed commercial sex acts with approximately two or more customers per night. Benjamin took all monies paid to MINOR VICTIM 1 for commercial sex. MINOR VICTIM 1 was instructed by

BENJAMIN to charge \$200 for one hour, and \$120 for half an hour. The commercial sex acts took place at motels near the 610 Loop and Main Street in Houston, TX.

10. MINOR VICTIM 1 indicated she was present during the event when BENJAMIN assaulted THOMAS on March 7, 2016. MINOR VICTIM 1 told investigators where they were staying at the time of the event. Hotel records corroborate the dates and times the incident took place.
11. On April 06, 2016, SA Theo Williams presented a photograph spread of six men, with similar characteristics, derived from an HPD database to MINOR VICTIM 1. MINOR VICTIM 1 positively identified BENJAMIN as the individual who had unprotected sex with her, physically assaulted her and forced her to engage in commercial sex.
12. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Antonio BENJAMIN with a violation of 18 U.S.C. §1591(a) - Sex trafficking of children.

  
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Theo Williams  
Special Agent, FBI

Subscribed and sworn before me this 21 Day of April 2016, and I find probable cause.

  
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Nancy K. Johnson  
United States Magistrate Judge